

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 05-11576-DPW

PARTNERS HEALTHCARE
SYSTEM, INC.,

Defendant.

/

**STIPULATION TO EXTEND TIME TO RESPOND
TO PLAINTIFF'S DISCOVERY REQUESTS**

Plaintiff United States of America and Defendant Partners Healthcare System, Inc. hereby stipulate to the extension of time for Partners to respond to Requests for the Production of Documents, Interrogatories, and Requests for Admission served by Plaintiff on October 11, 2005. Plaintiff has agreed to extend these discovery deadlines by two weeks. The parties therefore agree that the discovery deadlines shall be extended from November 14, 2005 to November 28, 2005.

Dated: November 14, 2005

Respectfully submitted,

PARTNERS HEALTHCARE SYSTEM, INC.

By:

/s/ Joseph H. Selby
BENJAMIN A. GOLDBERGER (BBO No. 654357)

JOSEPH H. SELBY (BBO No. 643275, *admitted pro hac vice*)
McDermott Will & Emery LLP
28 State Street
Boston, MA 02109
Telephone: (617) 535-4000
Facsimile: (617) 535-3800
E-Mail: bgoldberger@mwe.com
jselby@mwe.com

CHRISTOPHER KLIEOFTH (*admitted pro hac vice*)
McDermott Will & Emery LLP
600 13th Street, N.W.
Washington, D.C. 20005
Telephone: (202) 756-8310
Facsimile: (202) 756-8087
E-Mail: ckliefoth@mwe.com

UNITED STATES OF AMERICA

By:

/s/ Stephen T. Lyons
STEPHEN T. LYONS
Senior Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6546
E-mail: stephen.t.lyons@usdoj.gov

WDC99 1160818-1.057158.0039